

Transcript - March 12 AmeriCorps Rulemaking Session

AMERICORPS RULEMAKING SESSION

MARCH 12, 2004

CONFERENCE CALL

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COORDINATOR Good afternoon, and thank you for standing by. At this time, all participants are in a listen-only mode. After the presentation, we will conduct a question and answer session. Today's conference is also being recorded. If you have any objections, you may disconnect at this time. Now, I will turn the meeting to Mr. David Eisner. Sir, you may begin.

D. EISNER Thank you very much, and thanks to all of you on the call for taking part in this discussion about AmeriCorps Rule Making. It's our first public discussion about rule making, and so we are still getting our processes in place. I know that it's particularly difficult today, with grant deadlines approaching and other pressures. It's a very busy time of year, and we all greatly appreciate you taking the time to participate.

What we really want to do today is mostly listen and get your comments as soon as possible, but let me just take a couple of minutes to explain why we're here and how the meeting is going to work, and let me also introduce some other corporation staff.

Rosie Mauk, the Director of AmeriCorps, is here. She's going to spend a few minutes walking through the key issues that will be addressed through rule making. Gretchen Vandivere, the Director of Leadership and Training, will serve as facilitator during the question and answer, during the statement portion, and Frank Trinity, our General Counsel, is here, as well as Susanna Washburn, Senior Advisor.

Let me set the scene a little bit. It's been a very challenging year, and the corporation has emerged from 2003 with policy and procedures in place to ensure that we can have complete financial integrity and management integrity. We have an historic budget for 2004 to support a record 75,000 AmeriCorps members, as well as 540,000 senior core volunteers and 1.8 million Learn and Serve America participants.

Now paradoxically, the challenges of last year have also helped build greater bipartisan support for the work that AmeriCorps and our other service programs do, and we're trying very hard to take advantage of that momentum to move national and community service to the next level - to reform as well as expand it.

So why rule making? Well, over the past several years, debates over key issues concerning AmeriCorps, and in particular issues like sustainability, cost per member, matching requirements, performance measurements and volunteer generation, have resulted in varying grant guidelines and an inconsistent set of expectations on the part

of current and prospective grantees. This level of inconsistency and not-solid expectations is unacceptable.

The goal of rule making is to bring a greater level of predictability and reliability for our grantees to make the AmeriCorps program more efficient and effective, and also to make it more accountable.

The corporation has received clear direction from the President, from Congress and from our board of directors that we should use the rule making process to accomplish those ends as quickly as possible, in time for the 2005 grant cycle and the 2005 budget process. But, we know that we can't simply rush to resolve these issues. These issues are at the very heart of the AmeriCorps program. They bear an enormous burden for how we can move forward with our grant making. They have enormous consequences for our grantees and participants, and so we are working as hard as we can to take a thoughtful and deliberate approach, and to seek out the views of all of our stakeholders.

We're especially interested in talking to those who know the AmeriCorps program best - state commissions and national and state programs. These individuals and organizations have had a decade of experience operating AmeriCorps programs, and we can draw on that experience and capture the best ideas from the field and other stakeholders. By doing that, we'll be able to develop proposed rules that reflect all of the varied concerns.

Now, it's true that Congress grantees, potential grantees, AmeriCorps members, our board and staff, all have different points of view and different concerns about the future of national service. Particularly the issues at hand like sustainability, the federal share issues, volunteering leveraging, cost per member are all complex. They don't lend themselves to easy answers, and in the course of the past several years, there have been a variety of very different proposals put forward. But it really is in the interest of all of us to see that the goal of strengthening national service is achieved, and I believe that through this extended dialogue we can do it right.

I'm hoping, as we start this discussion, that you've had a chance to read the document on our Web site that has excerpts from legislation, Congressional reports and other official guidance related to the topics under rule making. This is a very important document because it shows some of the proposals being discussed and the pressures that the corporation is under to take actions of reform in a number of areas.

For example, our 2004 Appropriations law directs the corporation to "increase significantly the level of matching funds and in-kind contributions provided by the private sector, and reduce the total federal cost per participant in all programs, to the maximum extent practicable."

Others have made proposals that are even stronger, including putting a sunset on corporation grants. These points of views and those of others seeking greater restrictions on grantees may not be well represented on the call today, but I'm confident that the pressures for change are significant and need to be addressed. So let me quickly run through the basic process.

There are four key steps. Where we are right now is the preliminary public input. I want to make very clear this is an extra step. It does not need to be taken in the rule-making context. We're seeking input because we think that it will help us to get to the

formal stage of rule making with the best possible outcome. We're seeking input from grantees and also those who aren't grantees.

Our goal is to be completely transparent and open, and we're taking the entire month of March to get your input, with five public meetings, four conference calls, as well as written comments. If you aren't able to speak today, please either get onto another call or come to one of the public meetings, or you could send written comments to rulemaking@CNS.gov. Written comments do not have to be in any particular form; nobody needs to write a brief. You can just send your ideas and a way to contact you to follow up further.

After this preliminary input, the process becomes formal. We will then publish a proposed rule. Informed by public input, we're going to draft a set of proposed rules, which will be submitted to the Office of Management and Budget, which will then clear them, and those rules will also include an introduction or a preamble, as well as the text of the rules themselves.

Following clearance by ..., the rules will be issued and there will be a 60-day public comment period, which is the standard length of time. The comments that we receive will become part of a rule-making docket that is publicly available. I want to stress that that public comment period will be far less flexible than the one we are currently in. It will be far less iterative. We will have far less ability to carry on dialogues with individuals to follow up on comments, to ask questions, to pursue avenues, etc., which is another reason I think that this preliminary public input is so important.

Then finally, we'll publish a final rule based on analyzing the public documents and determining whether to make changes to the rules we've proposed. The final rule document will also respond to comments in the preamble and, again, it will be cleared by the Office of Management and Budget.

As far as timing goes, it's very difficult to give a specific timetable for the steps, but we are going to complete a section of the process by early fall. That will be the section of the process that deals with these specific issues that we've put forward in the intent to do rule making. There will be other pieces of rule making that will then follow, but they'll be mostly administrative.

I want to make, before we hear from Rosie on the subject matter and open it for comments, two points that I can't stress enough. First of all, as a corporation, we have no predetermination of what the outcome is going to be. We are not trying to grease the skids for any particular proposal. We are not set or committed or promised to any particular outcomes as it relates to rule making. We are going to really start from the point of the comments that we get today and at other public meetings to construct, for ourselves, what we believe is the right way to move forward.

Secondly, I want to underscore my commitment and the commitment of all of the staff here at the corporation that the outcome is fair and equitable. These kinds of changes are not easy, but if we commit ourselves to the task here, we can arrive at a fair and equitable compromise on many of the key issues that we've been talking about for some time. More importantly, we can ensure that the programs of the corporation will emerge stronger and better positioned than ever to receive the strong and lasting public and congressional support they deserve. So with that as a background, let me turn it over to Rosie Mauk to summarize the key issues.

R. MAUK Hi, everybody. Thanks, David. I'm not sure how many of you, but I hope all of you that have taken the time this afternoon to log onto the call, have looked at our Web site, and have looked at the materials that we've presented to you. One of those is the Federal Register that lays out some seven key questions and issues that we're going to be particularly addressing, and then we're open to other issues. That's what I'm going to talk about for just a moment.

We also have, in our document, some materials that show some public statements that have been made around each of these issues. It lays out what our current policy is on these issues and some that have been stated by some of our elected officials and some of our board members, and also by the White House. So I'm just going to, very quickly, walk you through those in case you haven't read them, or you're not as familiar as others might be.

The first one is a rather general question, and that is that, as AmeriCorps continues to grow, what changes can you identify to make the program more efficient and effective? Pretty open-ended, but this the process that our board of directors, over a year ago, started encouraging us to take a look at. So the point of that one is that we're wide open on what else can we do to reach the point that David said - to be more efficient and effective?

The next big issue is sustainability, and how can the corporation in the field achieve the right balance of federal and private support, and to what extent should the level of corporation support for a program or project perhaps decrease over time, and how can the corporation further support and encourage greater engagement of Americans in volunteering?

Both our board and our appropriators have asked us to actually define sustainability, which is something we hope to do in this process, and, in addition, statements have been made that the corporation may establish policies and procedures to set limits on the number of years that recipients may receive assistance to carry out a project, to increase the match requirements and implement at measures to determine whether projects are generating sufficient community support.

In regards to the federal share, should the corporation calibrate matching requirements to reflect the differences among programs? Should the corporation adopt matching requirements for member-related costs that are different from requirements for other program operation costs?

The White House, in its Executive Order, said that national and community service programs should leverage federal resources to maximize support for the private sector and from state and local governments, with an emphasis on reforms that enhance programmatic flexibility, reduce administrative burdens and calibrate federal assistance to the respective needs of recipient organizations.

Then some other issues - performance measures, evaluations. What are appropriate performance measures for our program, and how should grantees evaluate our program? In the Executive Order, again, the President suggested that national community service programs should adopt performance measures to identify those practices that merit replication and further investment, as well as to ensure accountability.

Then a few other issues - literacy and reading tutors: How can we ensure that members serving as reading tutors have the skills and ability to provide the necessary instructions to the populations they serve, and how should our literacy program develop their curriculum and training requirements?

Timing of our grants: Does the current timeframe work for those that are running our AmeriCorps programs, and what improvements can we make? Our appropriators encouraged the corporation to consider a change to the grant cycle so that grant award can be made to recipient organizations before the organization recruits members to fill awarded slots.

Then last, the selection criteria: What criteria should the corporation use in selecting programs, and how can the corporation streamline its grant application process for continuation applications? Our appropriators have asked the corporation to consider the priority given to programs that demonstrate quality, innovation and sustainability.

So with those issues kind of laid out in front of us, and any others that you all want to talk about and bring to our attention, Gretchen Vandivere is going to kind of walk through this process of our listening with you.

G. VANDIVERE Okay. We understand there are six of you on the call, and there might be others who will join.

M No, that was earlier. There are more now.

G. VANDIVERE Okay. Good. Very good. We have about an hour to an hour and a half that we want to be taking public comment, and so we would like to get your name and affiliation as you begin your comment so that we can have that for the record. We're also going to initially limit your comments to seven minutes. I will give you a one-minute warning. I don't necessarily expect that all of you will take seven minutes, but just so that we can get as many people as possible to have a chance, we want to let you know that there will be a cutoff point. We won't let anybody just go on and on. So please be mindful of that.

At the end of your comments, we will have clarifying questions from those of us here in Washington around the phone, particularly David and Rosie, I think will be looking to ask you, maybe, some follow-up questions. So that's how this is going to work. At the end of the call, we'll reiterate the information about where else you can provide written comments and when the other meetings and conference calls will be, so that if you have follow-up comments you'd like to make and weren't able to make today, you'll know that you have another opportunity. This is not the last one.

So with that, Michelle is our operator. I'm going to ask Michelle to open up the phones. You will need to get in the queue. We'll take you first-come, first-served.

D. EISNER Let me just add that comments are being recorded and then transcribed, and we're going to take all of those comments and use them to help us draft these guidelines.

G. VANDIVERE Michelle?

COORDINATOR Thank you. We will now begin the question and answer session. One moment, please, for our first question. Our first question comes from Martin Weinstein of Bay Area Community Resources.

M. WEINSTEIN Good afternoon, everyone. Hello, Rosie and David.

R. MAUK Hi, Marty.

D. EISNER Hi.

M. WEINSTEIN Speakers. Thank you for an opportunity to speak, and I'll try to be brief and hopefully concise. Just by way of background, our organization really has two roles in this discussion. One is as an honored member of the AmeriCorps family through BAC AmeriCorps, and also, I'm serving as the chairperson of the California AmeriCorps Alliance, which represents a large share of the grantees currently operating in California, and I think I speak from ten years of mostly exciting and effective experience, as well as, obviously, significant challenges. Let me speak primarily to the issue of sustainability and cost.

I believe that the notion of sustainability is important. However, it certainly should be looked at in terms of performance and quality as opposed to time limits. While that may be self-serving, I think there are some good economic and strategic reasons why that should be the case. Let me give you some of the data.

First, from an empirical perspective, only three programs in California have been in AmeriCorps since its inception. So, by empirical definition, there's a natural turnover, I think, based upon performance, evaluation and changing priorities in the field. So that's one issue I think we need to take a look at and make sure that we're not putting limits on programs that have been able to achieve sustainability based upon performance.

The second is, I think in terms of AmeriCorps, and particularly the notion of sustainability is somewhat different. Since programs, by definition, are changing their core members each year, we believe it's important to sustain the infrastructure to make sure that as many core members can participate in AmeriCorps and move through the process and work for organizations that have demonstrated quality and the capacity to support, manage, and help AmeriCorps members have a successful experience.

Lastly - or not lastly, two more points - is that I think one of the challenges is, the thing to think about is if, in fact, there are limits placed upon programs and that is looked at in the context of reducing federal share, which seems reasonable, then there may be some negative consequences of bringing in mostly new programs and increasing the federal share, because I think it's reasonable to assume that, as programs move forward, that their federal share does decline.

Lastly, in terms of cost per share, you might want to think about the notion of looking at cost benefits, as well as just reducing costs, and look at outputs and effectiveness as a way of measuring the efficiency on the federal dollar, and not just look at reducing costs, but look at cost in relationship to output and cost in relationship to performance. Those are sort of some initial thinking from our perspective, and we look forward to continually participating in the discussion and the process. Thank you.

D. EISNER Thank you. That's very interesting stuff. You note within there that you think it is appropriate to expect federal share to decline as a program matures. Is that a broad generalization? Is that applicable to most kinds of organizations? Would you be willing to speculate about what kind of progress you think is generally expectable as a grantee grows?

M. WEINSTEIN Well, I think that, obviously, there needs to be some clear thought about not making hard and fast rules for every single program and every single situation. But I think, as a general policy, it makes sense to think about how can the federal share, as a comparison of total revenue needed to run a program, could decline over time, both in terms of cash and in-kind resources. The specific number, David, are pretty hard to predict, and I think would take a lot more discussion and take a look at sort of like the experience of programs and doing more from an empirical perspective rather than just some kind of deductive expectation.

I know for our program, as an example - and this doesn't necessarily correlate to the field - is that we started out with a zero match from our member agencies, and now, member agencies contribute \$10,000. That was based upon their learning and experience and sense of value that AmeriCorps brings to the organizations and, as a result, their willingness to contribute directly from their own coffers. So there are so many different models in AmeriCorps that it would be very difficult, I think, to set very specific rules, but maybe those rules can vary with the kind of situation that AmeriCorps programs are running. I don't know if that answers your question or not.

D. EISNER It's helpful. Do you think that intermediaries are amenable to the same kinds of regulations as direct grantees, or does there need to be some separate way of managing the expectations of intermediaries?

M. WEINSTEIN Well, we're an intermediary, so I can speak directly from that point of view.

D. EISNER That's why I'm asking you.

M. WEINSTEIN The joke goes, in California, we were an intermediary before we were supposed to be intermediaries.

R. MAUK I don't know about that, Marty.

M. WEINSTEIN What we have been able to do is literally build consensus among our member agency to participate not only programmatically, but through in-kind and financially. What that enabled us to do is spread the risk around. If one organization cannot come up with the match, then there are other organizations that can. It gives small organizations an opportunity to participate and, as time goes on, people, as I said, see the value and the monetary value in participating from a matching perspective.

But I think it is true that intermediaries are significantly different in sort of kind than other kinds of AmeriCorps programs, and how that plays itself out in terms of rule making, we really haven't thought a lot about, but it's clear that the way intermediaries operate are different than the way more traditional kinds of core programs operate.

R. MAUK Marty, you don't have to answer this now, because I know we want to make sure that everybody feels like we're not just talking with Marty here on the phone, but the fact that you do know California so well, because of the alliance, it would be probably helpful, maybe as we're walking through this, to hear some other statistics, maybe not necessarily at this moment, but if you know that there are only three current AmeriCorps programs that have been funded by AmeriCorps from the beginning, do you know other statistics, like has there been a decrease in federal share of those grants? Has there been an increase in productivity with the same amount of money? Those are some of the kinds of issues that we're going to try to talk about and expand on when we talk about sustainability.

M. WEINSTEIN Okay.

G. VANDIVERE Thank you, Marty. Michelle, we're ready for the next call.

COORDINATOR Thank you.

G. VANDIVERE This reminds you to please state your name and affiliation and remember that we will be keeping time.

COORDINATOR At this time, there are no questions.

D. EISNER Okay.

G. VANDIVERE Just want to prompt the folks on the phone. I'm glad you tuned into the call to hear what rule making is all about and why we're doing this, so we would really like to hear from you. Does anyone have a comment on sustainability, federal share, cost per member, performance measurement, evaluation?

COORDINATOR We do have one question. Sheila Anderson of Child Abuse Prevention Council, your line is open.

S. ANDERSON Hello. This is Sheila Anderson. I, like Marty, am an intermediary project through the California Alliance for Prevention, a child abuse prevention project, and, like Marty, I'm the vice chair of the California Alliance. I wanted to talk a little bit about scale of project and the role of intermediaries and how that does affect rule making.

Many, many years ago, at sort of the beginning of AmeriCorps, our agency operated a very small, 20-member local project. The reality is that it was very costly for us to do that, per member. So I think you have to keep in mind some of the scale issues in terms of operating a program, because you still have to do all of the same activities, regardless of how large or small the project is. You're still doing training, so on and so on. You're still doing Web'ers, and that's a real impact.

I think that is one of the values of intermediary programs. So, for example, we have 159 individual host sites, none of whom has as many as 20 members, and, for them, it would be very difficult to accomplish what has to be done. So I do think there are differences in rule making between small individual one-site projects and large multi-site projects with intermediaries in terms of what's realistic.

D. EISNER Thank you, Sheila. As an intermediary, do you have your own set of guidelines that are separate from the corporation's guidelines, that you impose on your sub-grantees, and do any of them have to do with the broad issues around the length of eligibility for a grant, or around matching or share requirements?

S. ANDERSON We do have our own separate guidelines, and they incorporate many of the guidelines that you have and that we also get from our state commission, but they go beyond that to a whole variety of additional things. They're specific for our site.

We certainly do have requirements about match, about their share, and then we also work with them to maximize that and leverage those dollars if that's possible to do. We also have things that are not in our guidelines because there are certain things we take care of as the intermediary that they don't need to worry about, and so it's that combination of additions and deletions.

We have not ever taken the approach of "Gee, you could only be involved in the California Alliance for Prevention for two years or three years," or that sort of thing. It's been performance-based, and that's based on independent evaluation as well as the site visits from our own staff and the monitoring of the projects. So we really have looked at performance as the criteria for continuation.

D. EISNER One of the things that we're beginning to look at is we are moving into a future where the supply of AmeriCorps resources is coming increasingly lower than demand, so we're going to be saying no several times more often than we're saying yes. I don't know if you're, as an intermediary, in the same boat, with people asking you for resources and having to say no a lot of the time, but, in that environment, do you think that it changes the equity question in terms of does it make sense, at some point, to think that you ought to move resources from an organization that's had the opportunity to use them to an organization that hasn't?

S. ANDERSON Well, I can certainly tell you that this year, where we have gone from 377 members to 230, we had to do that with existing partners, and we did have to base those decisions, and we did, on performance, but also because you might have heard we're having a little budget deficit problem here in California.

D. EISNER We had one at the corporation, too.

S. ANDERSON We heard about that, as a matter of fact, David. Obviously, there were some partners who then were in jeopardy with matching funds that they got from local sources as a result too, so some people did self-select out, and I think what Marty said is really critical about that, about people self-selecting out because their situation changes, their focus changes, their matching funds change - whatever the case may be. I think it's very telling that there are only three projects that have been in operation the whole time. I think there some natural part of that.

I think it would be very difficult to take the increase that you have, for example, this year, from 30,000 to 75,000, and think that all new projects get up and running and make that happen, because what we have also found out, being an intermediary, is that whenever we start with a new host site or a new county, it's pretty intensive work to help them really get the hang of what they need to do, and how to effectively recruit, how to set the kind of systems and management in place to retain members. Those are not necessarily all easy things for people to instantly know how to do.

R. MAUK Sheila, and maybe your organizations aren't a good example of this since I know pretty much what they look like and that they're fairly similar. One of the conversations David and I are having with folks is when you talk about this natural attrition, we're trying to see if folks - and maybe there are some others on the call that could sort of react to this - are there some natural groupings that this type of program really just only needs great startup funding for three years, from the corporation, or others that need it for longer, or those that would need it forever, I mean, as opposed to the intermediaries?

S. ANDERSON Rosie, I can only give you my opinion, being in the nonprofit world, and that is that every grant and every program that we've ever been involved in has a sustainability section in the grant. If I really honestly knew where to go to get \$10 million next week, if they all expired, I would certainly be doing it, but I'd probably be growing the program. I think certainly, at least in the social service and educational arenas, it's pretty hard for those things to occur, for people to suddenly take a fairly significant amount of money and move it over.

Just because you've had great accomplishments, doesn't mean that there's another funding entity to continue an activity ready and waiting. Certainly the economic condition of the times is a factor in that. There may be some arenas where, for example, maybe getting a mentoring program started and using resources to do that, you then would have the system in place and you'd have the volunteer mentors and your costs would go down dramatically.

That's easy for me to say because that's not the kind of programs I do, but I can envision that there would be some of those kinds of projects, but I think any kind of a project that's working directly with children or families or elderly, for that matter, is based on relationships and continuity, and I don't know how you do that.

G. VANDIVERE Thank you, Sheila. Michelle, is there anyone else in the queue?

COORDINATOR At this time, there are no further questions.

G. VANDIVERE Okay. Well, we're going to hang here and hope that there is somebody else who wants to speak to one of these issues or speak to something else that they would like to us take into consideration in rule making.

COORDINATOR Our next question comes from Jennifer Ney of City Year.

J. NEY Hi, Rosie and David.

D. EISNER Hi.

R. MAUK Hi, Jennifer.

J. NEY Hello. I just have a quick question, not really a comment. But I saw in the President's Executive Order a reference to tutoring requirements, and an interest in AmeriCorps adhering to the paraprofessional requirements in No Child Left Behind. The same language wasn't used in your federal register notice. So I was wondering if we are looking to take AmeriCorps to that level and those kinds of requirements that were in that statute?

D. EISNER Well, first of all, it's the Executive Order isn't really a statute. We took it as a strong point that we have to make sure that, and we are looking, within this room, I think, to figure out how we ensure that when an AmeriCorps member is providing tutoring, particularly in-school curriculum-based tutoring, that we have the appropriate safeguards in place to ensure that that member is competent to do it.

I think that the corporation has a great deal of latitude to figure out how to manage that requirement, and I think that whereas the term "paraprofessional" may be a term of art, that we also have a great deal of latitude to determine exactly what it means that a member is competent and has sufficient training to be able to be a tutor.

J. NEY Great. Thank you very much.

G. VANDIVERE That answers your question, Jennifer?

J. NEY Yes, it does.

R. MAUK Do you have any in particular insights into that, from your perspective that we should hear?

J. NEY Yes, there's certainly just a concern. We do have AmeriCorps members in our program that are studying to get their GED and are not high school graduates, and so a concern is if we do have to qualify under paraprofessional and some of the requirements of our No Child Left Behind, what that kind of does to our program, and whether there's a population in our program that would not be able to continue to do literacy tutoring.

R. MAUK Okay. Thanks, Jennifer. It's helpful, Jennifer.

COORDINATOR Our next question comes from Allyson Streeter of Habitat for Humanity International.

A. STREETER I was just wondering if you could just explain a little more what's meant by streamline the application process for continuation?

D. EISNER Well, what we're really trying to do, mostly, is hear from you. I would say that I think we're really considering everything from reducing the continuation application by some percent, as well as make sure that we respond more quickly so that organizations that are in a continuation process hear, with alacrity, that they're going to get funding next year, as opposed to making them wait the full application cycle, all the way to the possibility of not having an application at all, simply making a three-year grant a three-year grant, then with possibilities in the middle, including maybe some kind of annual reporting on the basis or possibly providing variance reports on budget and program objectives.

I think that there are a lot of different ways and a lot of different levels that we can do that kind of streamlining. I'd be interested in what you think would be right and that you'd like to see in rule making.

A. STREETER Okay. Well that answers our question. I was thinking about it in more of a closed-minded way, so I'm glad I asked because I was thinking, "Well, there's a continuation process. How do we make that continuation process better?" But opening

it up to the possibility of not having a continuation process and having some kind of different monitoring makes a lot of sense, I think.

R. MAUK Allyson, an organization like yours at Habitat, I would guess that you get other federal funds besides the corporation, so maybe you could help us learn and look at some other examples.

A. STREETER Okay. Thank you.

R. MAUK Thank you, Allyson.

G. VANDIVERE Michelle, I think we're ready for the next question.

COORDINATOR Thank you.

G. VANDIVERE If there are no other questions or comments from the phones, we will go ahead and close down the call with some information about how, if you decide at a later date that you do have something you want to share with us, how you can get in touch with us. Michelle, if at any time as I'm saying these closing things someone pipes up with a question, we'll go ahead and take it.

COORDINATOR Okay. We do have one question. Would you like to take that?

G. VANDIVERE Yes, please.

COORDINATOR Okay. Martin Weinstein of Bay Area Community Resources, your line is open.

M. WEINSTEIN Yes, just to sort of highlight once again sort of a way to sort of conceptualize the issue of sustainability - and I have to keep emphasizing the fact that AmeriCorps is a particularly different kind of social service animal because, by definition, there is a change in the basic consumer group each year when AmeriCorps members turn over.

Given the complexity of running an AmeriCorps program, which I think we all know about, it seems to me that the strategic idea that would make sense was to make sure that infrastructure and capacity is sustained among high-performing programs, and then maximize the opportunity for core members to move through that process. So I just wanted to restate that, and hopefully you folks will think about sustainability in a particularly unique way, because AmeriCorps is particularly unique.

D. EISNER Thank you.

R. MAUK Thanks, Marty.

G. VANDIVERE Thanks, Marty. Well hopefully those of you on the phone have already been to www.AmeriCorps.org/rulemaking to read some of the documents that we have there. You can also find there the schedule of meetings that we have: March 15th in Columbus, Ohio; March 18th in Seattle, Washington; March 26th in Boston, Massachusetts; March 31st in Washington, D.C.; and April 2nd in Dallas, Texas. We've tried to go to one city in each of our five regions.

We also have four additional conference calls. There will be one on March 12th from 3:00 to 5:00, one on March 25th from 3:00 to 5:00, one on April 1st from 3:00 to 5:00, and one on April 5th from 1:00 to 3:00. In addition, as David mentioned at the beginning of the call, e-mail us. You can e-mail your comments to rulemaking@CNS.gov or you can send a fax to Nicky Gorran, Associate General Counsel, at (202) 565-2796, or you can send a snail mail and write us a letter at 1201 New York Avenue Northwest, Room 8209, Washington, D.C., 20525.

Again, today's call has been recorded. We are going to take the comments that were made on this call and we are going to collect these and all of the other comments from the other meetings in the calls and they will all be consolidated into what comes out as our official rule that gets released for then the official public comment period. So there will also be another comment period, which you may participate in as well.

So we thank you for your participation. I'm going to Michelle one last time; does anybody have a comment?

COORDINATOR At this time, there are no questions.

G. VANDIVERE Okay, then I'm going to turn it over to David Eisner.

D. EISNER I want to thank everyone for participating, and I just want to note, once more, that, in general, I can expect that we're going to get a lot more comments and a lot more energetic comments once the rules are drafted and released, but I would urge everyone not to be, I guess what you call "holding your powder dry" until then, because once we've proposed rules, we're going to be a) more restrained in how we conduct our conversation and b) it's going to be a more political process as we weigh the support and the challenges to each line of our draft proposal.

It's now, before we draft the proposal, that we really have the luxury of incorporating any points of view that makes sense to us, in our internal discussions, turning issues on their heads, coming up with new approaches, making sure that we protect specific interests.

So both for folks on this call and for folks you talk to, I can't urge you strongly enough to use this pre-rule process to weigh in with any concerns you have and any issues that you want to ensure we take into consideration, and any interests that you want to make sure you protect. With that, thank you all for your time. We appreciate it.

R. MAUK Thanks, everybody.

G. VANDIVERE Have a great weekend.